

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ARISE FOR SOCIAL JUSTICE;)	
AMERICAN CIVIL RIGHTS INSTITUTE; NEW ENGLAND STATE-AREA)	
CONFERENCE OF THE NAACP;)	
REV. TALBERT W. SWAN, II;)	
NORMAN W. OLIVER; DARLENE)	
ANDERSON; GUMERSINDO GOMEZ;)	
FRANK BUNTIN; RAFAEL RODRIQUEZ;)	
and DIANA NURSE)	Civil Action No. 05-30080-MAP
)	
Plaintiffs,)	
)	
v.)	
CITY OF SPRINGFIELD and SPRINGFIELD)	
ELECTION COMMISSION)	
)	
Defendants.)	
)	

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' TRIAL EXHIBITS

Plaintiffs submit the following list of objections in response to Defendants' List of Exhibits. Plaintiffs previously submitted a list of objections to Defendants' Trial Exhibits as Exhibit D to the Joint Pretrial Memorandum. The list below includes responses to exhibits that have been added to Defendants' list or clarified by Defendants since the Joint Pretrial Memorandum was filed on January 8, 2007.

Trial Exhibit Number	Description	Objection
1	Election Warden Handbook (undated)	
2(a)	1959 Election Results	
2(b)	1963 Election Results	
2(c)	1977 Election Results	
2(d)	1981 Election Results	
2(e)	1987 Election Results	
2(f)	1989 Election Results	
2(g)	1991 Election Results	
2(h)	1993 Election Results	
2(i)	1995 Election Results	
2(j)	1997 Election Results	

Trial Exhibit Number	Description	Objection
2(k)	1999 Election Results	
2(l)	2000 Election Results	
2(m)	2001 Election Results	
2(n)	2002 Election Results	
2(o)	2003 Election Results	
2(p)	2004 Election Results	
2(q)	2005 Election Results	Object
2(r)	2006 Election Results	
3	Affirmative Action Plan for Employment	
4	Springfield and its Neighborhoods: Statistical Profile dated March 2003	
5	Springfield and its Neighborhoods: Statistical Profile dated March 1993	
6	Listing of Neighborhood Councils/Organizations (dated 06/10/2005)	Object
7	HOME Allocations Citywide - 7/96 through present (dated 02/14/05)	Object
8	Consolidated Annual Performance & Evaluation Report — Fiscal Year 2004-2005	Object
9	City of Springfield's Action Plan — Fiscal Year 2006-2007	Object
10	Homebuyer Workshop Outline (undated)	Object
11	U.S. Department of Housing and Urban Development — HOME Investment Partnerships Program (HOME) Dashboard Report: received by Mayor Ryan on September 29, 2006	Object
12	Homebuyer Assistance Program — revised 06/2006	Object
13	HAP, Inc., Programs and Services: accessed from www.haphousing.org/programs/ on 11/10/2006	Object
14	Commonwealth of Massachusetts HOME American Dream Downpayment Initiative (ADDI) Buyer Assistance Application and Program Guidelines (updated June 2006)	Object
15	Various webpages from the City of Springfield's website	Object
16	Health Update: Pregnancies and Births 1993 – 2005	
17	Health Update: Pregnancies and Births 1993 – 2000	
18	Health Update: Births to Teens 1993 – 2000	
19	Health Update: Births to Teens 1991 – 1998	
20	Health Update: Neighborhood Perinatal Indicators 1989 – 1999	
21	Health Update: Substance Abuse Treatment among Springfield Residents (2nd edition/October 1999)	
22	Health Update: Substance Abuse Treatment among Springfield Residents (3rd edition/October 2000)	
23	Health Update: A Profile of the AIDS Epidemic in the City of Springfield, MA (2nd edition, 1999)	
24	Health Update: The HIV/AIDS Epidemic in the City of Springfield (3rd edition, 2002)	
25	Finding Solutions to Springfield's Oral Health Crisis (undated)	
26	Report from the Springfield Mayor's Crusade against Cancer Community Forum (October 2003)	
27	Department of Health and Human Services organizational chart (re. 09/22/2004)	Object
28	Department of Health and Human Services Reorganization Plan (undated)	Object

Trial Exhibit Number	Description	Objection
29	Contract by and between City of Springfield's Department of Public Health and the Criminal Justice Organization of Hampden County, Inc. for a Health Care Access Coordinator, effective July 1, 2004.	Object
30	Department of Health and Human Services Permit Fees Schedule (undated)	Object
31	EEO Report for The Department of Health and Human Services, for the period of 04/04/2004 thru 06/30/2004	
32	City Wide Violence Prevention Task Force Report (date uncertain)	Object
33	Department of Health and Human Services Job Descriptions (undated)	Object
34	Department of Health and Human Services budget for September 2004; and nine month budget for fiscal year 2005	Object
35	A Management Study of the Springfield Police Department: Executive Summary Conducted by Carroll Buracker & associates, Inc., dated May 4, 2005	
36	Inter-Departmental Correspondence 01/14/1992 and 12/21/2004	Object
37	Traffic Stop analysis 08/01/2005 thru 10/23/2006	Object
38	Crime Analysis 2005 (dated 10/21/2006)	Object
39	Internal Investigations Unit Statistical Information 01/01/2005 thru 12/31/2005	
40	Inter-Departmental Correspondence dated from 05/05/2006 thru 11/07/2006	
41	General Orders: G.O. 100 thru G.O. 700 and Protocol B: Responding to Biological Hazardous Materials	Object
42	Springfield Police Department Procedures for Investigation and Disposition of Citizen Complaints, including locations designated to receive complaints in the City of Springfield, fax from Springfield Police Chief, November 20, 1998	Object
43	The American Community Survey: Updated Information for America's Communities. U.S. Census Bureau 11/2001	Object
44	Community Policing: The Good Neighbor Handbook. Accessed from the Springfield Police Department's web site on January 11, 2007.	Object
45	School Committee minutes for October 12, 2000; February 21, 2002; March 21, 2002; September 19, 2002; November 21, 2002; April 3, 2003; and June 26, 2003	
46	June 21, 2005, memo from School Superintendent Dr. Joseph P. Burke regarding school improvement expenditures	Object
47	Springfield Public Schools' webpage; accessed from www.sps.springfield.ma.us on 12/18/2006	Object
48	Springfield Public Schools — Mission and Goals for 2005-2008	Object
49	Springfield Public Schools — Culture of Achievement (undated)	Object
50	Springfield Public Schools — Student and parent handbook 2006-2007 school year	Object
51	Springfield Public Schools — Pupil Progression Plan (undated)	Object
52	Springfield Public Schools — District Curriculum Accommodation Plan (undated)	Object
53	Springfield Public Schools — 2005-2006 NCLB District Report Card: accessed from www.sps.springfield.ma.us on 12/18/2006	

Trial Exhibit Number	Description	Objection
54	Springfield Public Schools — MCAS Results Over Time 2000-2004: Authored by Dr. Joseph P. Burke, Superintendent, September 22, 2004	
55	Step Up Springfield goals, dated 09/22/2004	Object
56	Copy of City of Springfield Manual, dated 1959, containing Rules and Orders of the City Council, "together with a list of City officers, committees, boards, commissions, and other information concerning the City of Springfield	
57	Rules and Orders of the City Council, dated January 2, 1962 and signed by the City Clerk	
58	Massachusetts General Laws, Chapter 44, Section 32. Submission to the City Council. Procedure for Approval, Rejection or Alteration	
59	Revised Ordinance of the City of Springfield 1956, the Charter of the City and the General Ordinances of the City, enacted as a whole February 4, 1957, effective March 1, 1957	
60	Massachusetts Acts, 1936, Chapter 140, "An Act Relative to the Time for Filing Nomination Papers for Candidates to be Voted for at City and Town Primaries	
61	Massachusetts Acts of 1901, Chapter 147, "An Act to Amend the Charter of the City of Springfield Relative to the Election of Aldermen and Councilmen"	
62	Massachusetts Acts of 1884, Chapter 303, "Am Act to Amend the Charter of the City of Springfield in Relation to the Election of Alderman"	
63	Massachusetts Acts of 1877, Chapter 146, "An Act to Revise and Amend the Charter of the City of Springfield	
64	Massachusetts Acts of 1852, Chapter 94, "Inhabitants of Springfield made a body corporate as the City of Springfield"	
65	Law Department inter office memo dated February 27, 1998; listing civil rights cases against the City	Object
66	June 16, 2005, letter from Patrick J. Sullivan, Director of Parks, Buildings and Recreation Management regarding document search	Object
67	June 15, 2005, facsimile transmission from the Department of Public Works regarding monies spent on road and sidewalks from 1996 thru the present	Object
68	"Event recognizes black politicians" Azell Cavaan, <u>The Republican</u> 02/25/2005	Object
69	"Taxes, health top councilor's agenda" Peter Goonan, <u>Union-News</u> 01/24/2000	Object
70	"Councilor wants colleges to pay - In lieu of tax plan pitched" Peter Goonan, <u>Union-News</u> 12/04/2000	Object
71	"Mayor says no to taxing nonprofits" Beatrice O'Quinn Dewberry, <u>Union-News</u> 12/07/2000	Object
72	"Tax rate decision follows weekend hearing" Peter Goonan, <u>Sunday Republican</u> 12/10/2000	Object
73	"Tax plan would hurt nonprofits that aid city" Staff, <u>Union-News</u> 12/11/2000	Object
74	"In-lieu-of-tax appeal opposed by mayor" Beatrice O'Quinn Dewberry, <u>Union-News</u> 12/15/2000	Object

Trial Exhibit Number	Description	Objection
75	"Tax idea for nonprofits rejected" Peter Goonan, <u>Union-News</u> 12/19/2000	Object
76	"Our candidate choices in Springfield elections" Staff, <u>Union-News</u> 10/31/2001	Object
77	"Bickering councilors to meet" Mary O'Shea, <u>Union-News</u> 10/26/1996	Object
78	"Drive aims to up Latino voting" Natalia Munoz, <u>The Republican</u> 03/27/2006	Object
79	"Computer policy adopted" Mary O'Shea, <u>Union-News</u> 05/06/1997	Object
80	"School board Oks computers for 2 members" Mary O'Shea, <u>Union-News</u> 05/24/1997	Object
81	"Albano orders search for waste in school budget" Carol Malley, <u>Union-News</u> 06/04/1997	Object
82	"3 councilors attack higher school bond - Call for commission revamp" Carol Malley, <u>Union-News</u> 07/23/1997	Object
83	"Officials uphold computer policy" Mary O'Shea, <u>Union-News</u> 02/02/1998	Object
84	"Raise bid revives computer issue" Mary O'Shea, <u>Union-News</u> 04/18/1998	Object
85	"Councilor criticized for remarks - McCollum, Ryan at odds over pay raise, computer" Mary O'Shea, <u>Union-News</u> 04/23/1998	Object
86	"At \$500 ahead, McCollum fans turn out" Mary O'Shea, <u>Union-News</u> 10/27/1999	Object
87	"School Committee expecting little upheaval despite vote" Mary O'Shea, <u>Union-News</u> 11/04/1999	Object
88	From the Connecticut Valley Historical Museum and newspaper research at the Springfield Public Library, various 1959 newspaper articles and "advertisements" from the Springfield daily newspapers concerning the "Plan A" government referendum	Object
89	"Ideas for Springfield," Vol. I, No. 3, prepared by Robert Shanley, Joint Civic Agencies, Future Springfield, Inc., distributed by the Springfield City Library	Object
90	Deposition Testimony of Jose Tosado, October 18, 2005, in <u>Arise for Social Justice v. City of Springfield</u> , C.A. No. 05-30080-MAP	Object
91	Deposition Testimony of Bud L. Williams, October 19, 2005, in <u>Arise for Social Justice v. City of Springfield</u> , C.A. No. 05-30080-MAP	Object
92	Massachusetts Election Statistics, The Elections Division, Office of the Massachusetts Secretary of State, regarding certain legislative district contests and registered voters and turn-out, for the following years: 1980, 1982, 1984, 1986, 1988, 1990, 1992, 1994, 1996, 1998, and 2000	
93	Urban Voters Go to the Polls: Comparing Voter Turnout in Massachusetts Cities: 2000 to 2004. Prepared by MassVOTE	Object
94	Voting Behavior in Springfield, a Statistical and Analytical Report, September 1973, Springfield Urban League	Object
95	Voting Behavior in Springfield, a Statistical and Analytical Report, Second Edition, 1973-1982; Springfield Urban League	Object
96	Agreed Settlement Order, September 15, 2006	

Trial Exhibit Number	Description	Objection
97	Selected excerpts of Transcript of TRO Hearing Held Before the Honorable Michael A. Ponson, United States District Court Judge, August 28, 2006	Object
98	Opposition to Plaintiffs' Request for a Temporary Restraining Order or in the Alternative, for Preliminary Injunction, and Cross Motion for Preliminary Injunction and Order to Exclude, or in the Alternative Defer, Introduction of Declarations or Testimony, including Exhibits	Object
99	Spanish Surname Analysis of Registration provided by Department of Justice, Civil Rights Division, Voting Section for 2004 and 2005	
100	Letter dated September 28, 2006 from John "Bert" Russ of the U.S. Department of Justice, Civil Rights Division to City Solicitor Pikula regarding Spanish surname analysis of the July 2006 voter registration list.	
101	Letter dated 01/05/2007 to City Solicitor Pikula from John "Bert" Russ of the U.S. Department of Justice Civil Rights Division regarding the City's significant progress in resolving the issues that were brought forward in the initial complaint.	Object
102	Notice of the Filing of Federal Observer Reports for the September 2006 Election	
103	Notice of the Filing of Federal Observer Reports for the November 2006 Election	.
104	Copies of notices published in Spanish-speaking media	Object
105	Copies of signs drafted by staff of the Springfield Election Commission and posted in polling places	Object
106	Index and copies of selected documents, forms, and information provided on http://www.springfieldcityhall.com/COS/elections/ by the Springfield Election Commission	Object
107	Index and copies of documents, forms, and information provided on http://www.sec.state.ma.us/ele/eleidx.htm by the Elections Division, Office of the Secretary of the Commonwealth	Object
108	List of poll workers by polling place for the 2006 primary and general election, Office of the Election Commission, prepared by Ms. Gladys Oyolo, Spanish Language Election Program Coordinator	Object
109	Notice of Meeting for the Spanish Language Advisory Committee	Object
110	Expert Witness Report in <u>Arise for Social Justice v. Springfield</u> , of Dr. Stephan Thernstrom, May 24, 2006	Object
111	Rejoinder to Rebuttal Reports of Douglas Amy and Richard Engstrom for <u>Arise for Social Justice v. Springfield</u> , October 30, 2006;	Object
112	Curriculum vitae of Dr. Stephan Thernstrom	Object
113	Deposition of Dr. Thernstrom taken on Wednesday, August 2, 2006	Object
114	Bullock, Charles S. III and Richard E. Dunn, "The Demise of Racial Districting and the Future of Black Representation," 48 <u>Emory Law Journal</u> (Fall, 1999).	Object
115	Data from United States Census Bureau's American FactFinder, http://factfinder.census.gov/home/staffiman.html .	Object

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116	Highton, Benjamin and Arthur L. Burris, "New Perspectives on Latino Voter Turnout Rates in the United States," <u>American Politics Research</u> , Vol. 30, No. 3 (May, 2002)	Object
117	Brace, Kimball, Lisa Handley, Richard G. Niemi, and Harold W. Stanley, "Minority Turnout and the Creation of Majority-Minority Districts," 23 <u>American Politics Quarterly</u> (April, 1995)	Object
118	Haijnal, Zoltan L. and Paul G. Lewis, "Municipal Institutions and Voter Turnout in Local Elections," 38 <u>Urban Affairs Review</u> (2003)	Object
119	Halligan, Alice L., "A Community's Total War Against Prejudice," 16 <u>Journal of Educational Sociology</u> (February, 1943).	Object
120	"US Census Points to More Minorities," <u>The Republican</u> , Stan Freeman (May 10, 2006)	Object
121	"Event Recognizes Black Politicians," <u>The Republican</u> , Azell Murphy Cavaan (February 25, 2005)	Object
122	"Taxes, Health Top Councilor's Agenda," <u>Union-News</u> , Peter Goonan (January 24, 2000)	Object
123	"Computer Policy Adopted," <u>Union-News</u> , Mary Ellen O'Shea (May 6, 1997)	Object
124	"At \$500 a head, McCollum Fans Turn Out," <u>Union-News</u> , Mary Ellen O'Shea (October 27, 1999)	Object
125	"Drive Aims to Up Latino Voting," <u>Union-News</u> , Natalia Munoz (March 26, 2006)	Object
126	"Hatred Still Haunts Many Lives, Minorities Face Bias Every Day," [reporter], <u>Sunday Republican</u> (October 16, 1994)	Object
127	"Political Talent Emerges in the Suburbs," Gromers Jeffrey, Jr. <u>Dallas Morning News</u> , June 29, 2005	Object
128	Expert Report of Professor John Harmon (March 9, 2006);	Object
129	Curriculum vitae of John E. Harmon, Ph.D.;	
130	Exhibit A from the Expert Report of Professor John Harmon (March 9, 2006);	Object
131	Exhibit B from the Expert Report of Professor John Harmon (March 9, 2006);	Object
132	Excerpts from deposition transcript of John E. Harmon, PhD (April 7, 2006)	Object
133	Exhibit number 2 from the deposition of John E. Harmon, PhD (April 7, 2006)	
134	Exhibit number 3 the deposition of John E. Harmon, PhD (April 7, 2006)	Object
135	Exhibit number 4 from the deposition of John E. Harmon, PhD (April 7, 2006)	Object
136	Excerpts from deposition transcript of Douglas James Amy (April 21, 2006), including excerpts from documents (exhibits) used during deposition obtained from Dr. Amy's website: http://www.m.tholyoke.edu/acad/poli.t/damy	Object
137	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 1 — Notice of Deposition	
138	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 2 — Curriculum Vitae of Douglas J. Amy	
139	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 3 — Amy, Douglas J., "What is Proportional Representation and Why do We Need This Reform?"	

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140	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 4 — Amy, Douglas J., "A Brief History of Proportional Representation in the United States"	
141	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 5 — Amy, Douglas J., "How Proportional Representation Would Finally Solve Our Redistricting and Gerrymandering Problems"	
142	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 6 — Amy, Douglas J., "Fair Representation for Racial Minorities: Is Proportional Representation the Answer?"	
143	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 7 — Amy, Douglas J, Robert Richie and Frederick McBride, "How Proportional Representation Can Empower Minorities and the Poor"	
144	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 8 — Hill, Steven, "A Voting Rights Act at War With Itself"	Object
145	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 9 — Amy, Douglas J., "What are Voting Systems and Why are They Important?"	
146	Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 10 — Expert Report of Professor John Harmon	Object
147	Expert Report of Douglas J. Amy, Ph.D., (March 9, 2006)	Object
148	Rebuttal report of Douglas J. Amy, Ph.D. (September 14, 2006)	Object
149	Expert Report of Richard L. Engstrom, Ph.D.(March 8, 2006)	Object
150	Rebuttal Report of Richard L. Engstrom, Ph.D.(September 14, 2006)	Object
151	Deposition transcript of Richard L. Engstrom, Ph.D. (April 19, 2006)	Object
152	Curriculum vitae of Richard L. Engstrom, Ph.D.	
153	Human Relations Commission Report prepared by the Intergroup Relations Office (undated)	
154	An Ordinance Human Relations Commission (undated)	
155	Report of the HRC Task Force on Purposes and the Community Education Committee (undated)	
156	Report-Springfield Human Relations Commission (dated January 1962)	
157	City of Springfield, Human Relations Commission, Annual Report for 1962	
158	City of Springfield, The Office of Intergroup Relations, Annual Report for 1963	
159	The Office of Intergroup Relations, Springfield, Massachusetts, Semi-Annual Report, January 1, - June 30, 1964	
160	The Office of Intergroup Relations, Springfield, Massachusetts, Annual Report, 1965	
161	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1966	
162	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1967	
163	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1968	

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164	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1969	
165	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1970	
166	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1971	
167	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1972	
168	Human Relations Commission, Springfield, Massachusetts, Annual Report, 1973	
169	Proposal Arise for Social Justice — Request for \$50,000 to educate low-income people on entitlement programs 2002 May 24	Object
170	Political Flyer FOCUS (A Black Alliance) Supports Ryan for Mayor (undated)	Object
171	Campaign Finance Report 12/31/2005, Municipal Form Orlando Santiago	Object
172	Summary Report of Campaign Receipts and Expenditures Committee to Elect Carol Lewis-Caulton 10/31/2001	Object
173	US District Court Consent Decree 12/12/1994 Castro et al v Beecher et al	
174	City Council Salaries and the Competitiveness of Elections: A Survey Worcester Regional Research Bureau 09/22/2005	Object
175	“Enhancing’ Factors in At-Large Plurality and Majority Systems: A Reconsideration”, Richard Engstrom and Michael McDonald Electoral Studies, 12:4, 385-401 (1993)	
176	Copies of sample ballots in Spanish from the 2005 municipal election, provided by Rafael Nazario, 2005 candidate for City Council	Object
177	Spanish surname analysis of turnout for the 1999, 2001, and 2003 elections conducted by Plaintiffs with letter dated July 25, 2006 to Deanne Bogan Ross from Anna-Marie Tabor, Goodwin Procter	Object
178	Spanish surname analysis of July 2006 registration conducted by the Department of Justice, Civil Rights Division, Voting Section, with letter dated September 28, 2006 to Edward M. Pikula from John “Bert” Russ, Veronica S. Jung, Attorneys, Voting Section	
179	1990 Census data for Hampden County precincts provided by Election Data Services, Inc., 1225 I Street NW, Suite 700, Washington, D.C., entitled State of Massachusetts LED Review Commission	Object
180	Copies of the pleadings in <u>Commonwealth of Massachusetts, et al. v. United States of American</u> , C.A. No. 83-0945, produced by Paul A Lazour, who was the attorney of record for the Massachusetts Attorney General in the case, with letter dated October 26, 2006 to Deanne E.B. Ross from Paul A Lazour	Object
181	Chart A & Chart A-1 — November 1991 and November 1993 Springfield City Council election tabulations	Object
182	Chart B & Chat B-1 — November 1995 and November 1997 Springfield City Council election tabulations	Object
183	Chart C — November 1999 Springfield City Council election tabulations	Object
184	Chart D — November 2001 Springfield City Council election tabulations	Object

Trial Exhibit Number	Description	Objection
185	Chart E — November 2003 Springfield City Council election tabulations	Object
186	Chart F — November 2005 Springfield City Council election tabulations	Object
187	Chart G — Springfield School Committee election tabulations for November 1991; 1993; 1995; 1997; 1999; and 2001	Object
188	Chart H — November 2003 Springfield School Committee election tabulations	Object
189	Chart I — November 2005 Springfield School Committee election tabulations	Object
190	Chart L — Election tabulations for referendum questions on the November ballots for 1959; 1963; 1977; 1987; and 1997	Object
191	Chart R — November 1981 Springfield School Committee election tabulations	Object
192	Chart S —Election tabulations for former Springfield School Committee member Robert McCollum for the November election in 1989; 1991; 1995; 1999 and 2003	Object
193	Chart T — Election tabulations for former Springfield School Committee member Carmen Rosa for the November 1993 election	Object
194(a)	Marrier Demographic map of Springfield, with precinct and ward boundaries; African American voting age population	Object
194(b)	Marrier Demographic map of Springfield, with precinct and ward boundaries; Hispanic voting age population	Object
194(c)	Marrier Map of Springfield, neighborhoods	Object
194(d)	Marrier Map: Plaintiffs' nine single-member district plans, with residence of incumbents, former incumbents, candidates, and named Plaintiffs, plus demographic data of plans	Object
194(e)	Marrier Map: Plaintiffs' six single-member district plans	Object
194(f)	Marrier Map: Two-plan overview: Plaintiffs' nine single-member district plan and precinct boundaries; plus identification of the precincts that are split	Object
194(g)	Marrier Map: Two plan overview: Plaintiffs' nine single-member district plan and ward boundaries	Object
194(h)	Marrier Map: Two plan overview: Plaintiffs' nine single-member district plan and neighborhood boundaries; plus identification of neighborhoods split	Object
194(i)	Marrier Map: Two-plan overview: Plaintiffs' six single-member district plan and precinct boundaries; plus identification of the precincts that are split	Object
194(j)	Marrier Map: Two plan overview: Plaintiffs' six single-member district plan and ward boundaries	Object
194(k)	Marrier Map: Two plan overview: Plaintiffs' six single-member district plan and neighborhood boundaries; plus identification of neighborhoods that are split	Object
194(l)	Marrier Map: Partial thirteen single-member district plan, with minority-majority districts boundaries, plus demographics of minority-majority districts	Object
194(m)	Marrier Map: Nine single-member district plan that splits one precinct; plus demographic data of plans	Object
194(n)	Marrier Map: Nine single-member district plan with one two member majority African American district and one two-member majority Hispanic district	Object

Trial Exhibit Number	Description	Objection
194(o)	Marrier Map: Two plan overview: Plaintiffs' six single-member district plan and plaintiffs' nine single member plan	Object
195	2000 Census Data - PL 94-171: Prepared by Massachusetts Voter Education Project United States Census data for the City of Springfield for 2000.	Object
196	Engstrom, Richard L., Stanley A. Halpin, Jr., Jean A. Hill, and Victoria M. CaridasButterworth, "Louisiana," <u>Quite Revolution in the South, The Impact of the Voting Rights Act 1965-1990</u> , Chandler Davidson and Bernard Grofman, ed., Princeton University Press, (1994),103-135.	
197	Bullock III, Charles S., "Turnout in Municipal Elections," Policy Review, Spring 1990, Vol. 9, No. 3, pp. 539-549.	Object
198	"Ward-based council is issue anew", Union-News, February 19, 2002, Peter Goonan	Object
199	Grofman, Bernard; Lisa Handley and Richard G. Niemi, <u>Minority Representation and the Quest for Voting Equality</u> (Cambridge University Press, 1992), 104.	Object
200	American Community Survey data for 2005 for the City of Springfield, http://factfinder.census.gov/home/staff/man.html	Object
201	Springfield City Council Vote of October 2, 2006, on "An Act Providing for the Election of City Councilors and School Committee persons within the City of Springfield" and a draft of the Act.	
202	Names of persons casting provisional ballots in the 2006 primary and general elections.	
203	Declarants for the United States in the <i>United States v. City of Springfield</i> voting history as compiled by Ms. Gladys Oyola, Spanish Language Program Coordinator for the City of Springfield.	Object
204	Declarant for the United States in the <i>United States v. City of Springfield</i> interview notes as compiled by Ms. Gladys Oyola, Spanish Language Program Coordinator for the City of Springfield.	Object

Respectfully submitted,

ARISE FOR SOCIAL JUSTICE; *¿OISTE?*; NEW ENGLAND STATE-AREA CONFERENCE OF THE NAACP; REV. TALBERT W. SWAN, II; NORMAN W. OLIVER; DARLENE ANDERSON; GUMERSINDO GOMEZ; FRANK BUNTING; RAFAEL RODRIQUEZ; and DIANA NURSE

By their attorneys,

/s/ Paul E. Nemser

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Dated: March 9, 2007

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Plaintiffs' Objections to Defendants' Trial Exhibits was filed electronically with this Court on this 9th day of March, 2007 and that all parties will be served via the Court's electronic filing system.

/s/ Paul E. Nemser
Paul E. Nemser (BBO #369180)